

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SARA TAYLOR, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

KIN INSURANCE, INC.,

Defendant.

Case No. 1:25-cv-00213

Judge: Hon. April M. Perry

Hon. M. David Weisman

**AGREED MOTION FOR ENTRY OF AGREED CONFIDENTIALITY ORDER**

Defendant Kin Insurance, Inc. (“Defendant”) hereby moves the Court to enter a protective order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure regarding documents and other material to be produced by the Parties in this matter. In support of this motion, Defendant states as follows:

1. The parties agree that in litigating this case certain information and documents may be sought and disclosed, which may include confidential, sensitive and/or personal information.
2. The parties agree that good cause exists for the entry of a protective order based on the nature of the documents and information that may be produced in this case.
3. To control the disclosure of this confidential information, the parties have agreed to the terms of the proposed Agreed Protective Order, based upon the Court’s Model Order.
4. The proposed Order is being submitted concurrently with this Motion. Per the local rule, the draft Order includes a redline (Exhibit 1) and clean version (Exhibit 2) reflecting the parties’ proposed edits.

Dated: August 25, 2025

Respectfully submitted,

By: /s/ A. Paul Heeringa

A. Paul Heeringa (IL ARDC #6288233)  
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**CERTIFICATE OF SERVICE**

I certify that, on August 25, 2025, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic docket.

/s/ A. Paul Heeringa